

# Exhibit A

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE**

**JESSICA JONES, MICHELLE VELOTTA, and  
CHRISTINA LORENZEN on Behalf of  
Themselves and All Others Similarly Situated,**

**Plaintiffs,**

**v.**

**VARSITY BRANDS, LLC, VARSITY SPIRIT,  
LLC, VARSITY SPIRIT FASHION &  
SUPPLIES, LLC, U.S. ALL STAR  
FEDERATION, INC., JEFF WEBB,  
CHARLESBANK CAPITAL PARTNERS LLC,  
and BAIN CAPITAL PRIVATE EQUITY,**

**Defendants.**

**Case No. 2:20-cv-02892-SHL-cgc**

**JEFF WEBB’S OBJECTIONS AND ANSWERS TO PLAINTIFFS’ FIRST SET OF  
INTERROGATORIES**

Pursuant to Rules 33 and 26 of the Federal Rules Civil Procedure, Defendant Jeff Webb (“Webb”) submits his Objections and Answers to Plaintiffs’ First Set of Interrogatories to Defendant Jeff Webb (the “Interrogatories”) as follows:

### **OBJECTIONS TO DEFINITIONS**

1. Mr. Webb objects to the definition of the term “Document” and “Documents” as used in Definition 4 to the extent those terms are inconsistent with the Federal Rules of Civil Procedure. Mr. Webb will interpret those terms consistent with the Federal Rules of Civil Procedure.

2. Mr. Webb objects to the terms “You,” “Your,” or “Your company” in Definition 7 to the extent they seek to include any person or entity beyond Jeff Webb. Where “You,” “Your,” or “Your company” appears in the requests, Mr. Webb will interpret the terms to refer to Jeff Webb, individually.

### **OBJECTIONS TO INSTRUCTIONS**

1. Mr. Webb objects to the Instructions to the extent Plaintiffs seek to impose any burden on Mr. Webb beyond those required by the Federal Rules of Civil Procedure or the Local Rules of the Western District of Tennessee. Mr. Webb will respond in accordance with the Federal Rules of Civil Procedure and the applicable Local Rules, and will otherwise disregard instructions 2 through 6 and 8 through 15.

2. Mr. Webb objects to the time period contained in Instruction 7, as well as the definition of the “Relevant Time Period” as overly broad and unduly burdensome, and as contrary to the limits on discovery previously imposed by the Court. To the extent Mr. Webb responds to the Requests, he will only do so for the period of January 1, 2015 to December 10, 2020.

### **INTERROGATORIES**

#### **INTERROGATORY NO. 1:**

State each affirmative defense to the claims against You.

**ANSWER:** Mr. Webb objects to Interrogatory No. 1 as overly broad in that it imposes a burden on Mr. Webb in excess of the requirements of the Federal Rules of Civil Procedure. Pursuant to Federal Rule of Civil Procedure 8, Mr. Webb is obligated to state his affirmative defenses in responding to Plaintiffs' pleading. Mr. Webb's deadline to file an answer in response to Plaintiffs' Complaint Class Action has not yet occurred. Subject to and without waiving the foregoing objections, Mr. Webb will state his affirmative defenses, if any, when required to file an answer in accordance with the Federal Rules.

**INTERROGATORY NO. 2:**

State each fact which supports each affirmative defense in response to Interrogatory No. 1.

**ANSWER:** Mr. Webb objects to Interrogatory No. 2 as premature and overly broad in that it imposes a burden on Mr. Webb in excess of the requirements of the Federal Rules of Civil Procedure. Pursuant to Federal Rule of Civil Procedure 8, Mr. Webb is obligated to state his affirmative defenses in responding to Plaintiffs' pleading. Mr. Webb's deadline to file an answer in response to Plaintiffs' Complaint Class Action has not yet occurred. Mr. Webb will state his affirmative defenses, if any, in his responsive pleading in accordance to his deadline to do so under the Federal Rules.

Mr. Webb also objects to Interrogatory No. 2 as premature because discovery is ongoing and the Interrogatory requires Mr. Webb to "state each fact" supporting each affirmative defense. Mr. Webb objects further to this Interrogatory on the grounds that it contains multiple subparts, with each affirmative defense that Mr. Webb will assert constituting a separate subpart. Combined with the Plaintiffs' Second Set of Interrogatories, Plaintiffs have exceeded their limit

of twenty-five interrogatories under Federal Rule of Civil Procedure 33. Subject to and without waiving the foregoing objections, Mr. Webb will state facts supporting his affirmative defenses at the time and to the extent required by the Federal Rules.

Date: April 4, 2022

Respectfully submitted,

By: /s/ Brendan P. Gaffney

Paul E. Coggins\*  
Brendan P. Gaffney\*  
Kiprian E. Mendrygal\*  
Jennifer McCoy\*  
LOCKE LORD LLP  
2200 Ross Avenue, Suite 2800  
Dallas, TX 75201  
Phone: (214) 740-8000  
Fax: (214) 740-8800  
pcoggins@lockelord.com  
bgaffney@lockelord.com  
kmendrygal@lockelord.com  
Jennifer.mccoy@lockelord.com

\* Admitted *pro hac vice*

Edward L. Stanton III (TN Bar #018904)  
BUTLER SNOW LLP  
6075 Poplar Avenue, Suite 500  
Memphis, Tennessee 38119  
Telephone: (901) 680-7336  
Facsimile: (901) 680-7201  
Edward.Stanton@butlersnow.com

*Attorneys for Jeff Webb*

**CERTIFICATE OF SERVICE**

By my signature below, I do hereby certify that on April 4, 2022, a true and correct copy of the foregoing was served on all parties of record in this case via email and/or certified mail.

By: /s/ Brendan P. Gaffney  
Attorney for Jeff Webb